

## EXHIBIT B

# Maverick

REAL ESTATE PARTNERS

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January 3, 2019

**Via Overnight Courier & Electronic Mail (adi@maverickcp.com)**

Maverick Commercial Properties Corp.  
232 Madison Avenue, Suite 606  
New York, New York 10016  
Attn: Adi Chugh

**Re: Infringement of Maverick Real Estate Partners LLC's Intellectual Property Rights**

Dear Mr. Chugh:

As you likely know, since as early as 2007, Maverick Real Estate Partners LLC and its affiliated companies (collectively, “Maverick”) have operated as a private equity fund manager that acquires commercial mortgages, property, and other debt instruments in and around New York City.

Maverick’s use and promotion of its name, Maverick, Maverick Real Estate Partners LLC, and the Maverick logo shown above (collectively, the “Maverick Marks”) in connection with these financial services has garnered significant goodwill and a fine reputation in the investment and financial services industries. The Maverick Marks are of great value and we vigorously protect our proprietary rights.

It has recently come to Maverick’s attention that in August of 2018, long after Maverick began using the Maverick Marks, Maverick Commercial Properties Corp. (“Maverick CP”) was formed and began offering private equity, distressed loan acquisition and various other real estate services using the name “maverick”. Specifically, as recently as August 2018, you adopted the name Maverick Commercial Properties, Corp. and began to operate the <[www.maverickcp.com](http://www.maverickcp.com)> website.

Your use of Maverick CP for nearly identical services in the same geographic region has already caused actual confusion. For example, as recently as December 27, 2018, The Real Deal, a local media company that reports on transactions involving New York City real estate, published an article (copy attached) wherein it mistakenly misidentified Maverick as a participant in a transaction involving Maverick CP. Furthermore, some of Maverick’s investors have been misled into mistakenly believing that Maverick CP was a new venture by Maverick. In other instances, potential investors have advised that they believed you to be affiliated with Maverick.

Your continued use of Maverick CP, or any variation thereof, is likely to cause further confusion and deception among the public and trade as to the source or origin of your services,

Maverick Real Estate Partners LLC

December 28, 2018

and/or as to whether your services are connected with, licensed by, or affiliated with, Maverick all to the detriment of Maverick. Maverick CP's unauthorized use of the Maverick name is a clear violation of Maverick's trademark rights.

Maverick CP's unauthorized use constitutes, *inter alia*, trademark infringement under Section 32 of the Lanham Act (15 U.S.C. § 1114); and false designation of origin under Section 43(a) of the Lanham Act (15 U.S.C. § 1125(a)); as well as trademark infringement, misappropriation, and unfair competition under related state statutory and common law doctrines.

Consequently, if Maverick is forced to file a lawsuit to stop Maverick CP from further intentional violations of the law, Maverick would not only be entitled to an injunction, but it could also be awarded treble damages and attorney's fees.

However, Maverick would much prefer to resolve this matter amicably. To that end, Maverick hereby requests that Maverick CP immediately: (i) cease and desist from using Maverick CP, "maverick", the Maverick Marks, or any confusingly similar name or mark as, or as part of, its name; (ii) cease and desist from any other act which is likely to infringe upon the Maverick Marks, or creates the impression that your services are sponsored, authorized by, or are associated or affiliated with Maverick; and (iii) cease distribution of any materials using Maverick Commercial Properties (or any confusingly similar name or mark).

Absent Maverick CP's compliance with our demands within ten (10) days, Maverick will be forced to consider all remedies available to it under the Lanham Act and other applicable laws.

The foregoing is without prejudice to Maverick's rights and remedies in connection with this matter, all of which are expressly reserved.

Please be guided accordingly.

Very truly yours,

MAVERICK REAL ESTATE PARTNERS LLC

By:

Jason S. Leibowitz, Esq.  
General Counsel

Chetrit Group, JPMorgan Chase & Co., 545 West 37th Street

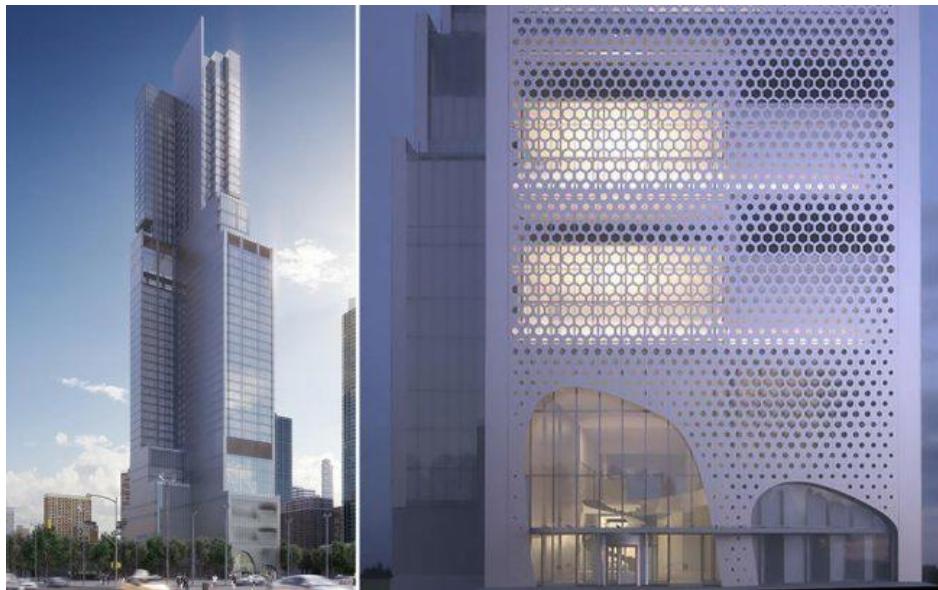
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## Chetrit lands \$85M loan for Hudson Yards mixed-use project

*Predevelopment loan from JPMorgan Chase and Mack Real Estate is for 545 West 37th Street*

By [Eddie Small](#) | December 27, 2018 04:00PM



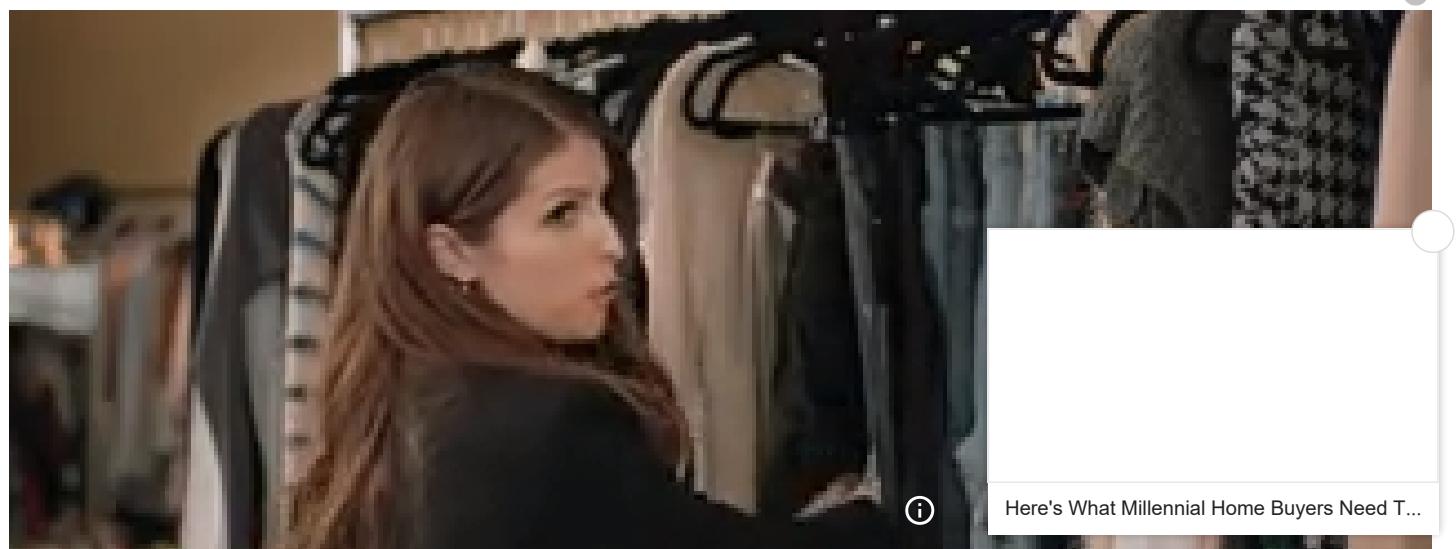
545 West 37th Street

**UPDATED, 4:57 p.m. Dec. 27:** The Chetrit Group has received an \$85 million refinancing for its massive mixed-use project at [545 West 37th Street](#), according to sources familiar with the deal.

The predevelopment loan comes from JPMorgan Chase and Mack Real Estate, and it was arranged by Galaxy Capital. Maverick Capital Partners also helped broker the deal on the JPMorgan side.

Representatives for Chetrit and JPMorgan did not respond to requests for comment. Representatives from Galaxy Capital and Mack Real Estate declined to comment.

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Chetrit bought the Hudson Yards development site in 2012 for \$26.5 million. The firm is planning a [46-story hotel](#) and residential project that should span about 373,000 square feet and stand 622 feet tall. The hotel will be on floors nine through 27 and contain 358 rooms, and the residential portion will occupy floors 32 through 46 and contain 131 residential units.

*Correction: An earlier version of this story misidentified one of the brokers. It was Maverick Capital Partners, not Maverick Real Estate Partners.*

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Tags: [Chetrit Group](#), [JPMorgan Chase](#), [Real Estate and Finance](#)

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